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Defendants' Letter Motion (ECF No. 35) is GRANTED. Defendants shall respond to the Amended Complaint no later than July 30, 2025. The parties shall file the Proposed Case Management Plan no later than August 13, 2025.

SO ORDERED.  
Dated: July 2, 2025

June 30, 2025

**VIA ECF**

The Honorable Stewart D. Aaron, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Escamilla et al. v. 48 West 21<sup>st</sup> Street Corp. et al.*  
Case No. 1:25-cv-00784-VSB-SDA

Dear Judge Aaron:

We represent defendants 48 West 21<sup>st</sup> Street Corp. d/b/a Taj Lounge Restaurant, David Casey, Mark Philip Quilter, and Matthew Knott in this wage and hour case brought by plaintiffs Francisco Delgado Escamilla, Carlos Contreras Cayetano, Fernando Perez Garcia, Eliezer Perez Molina, Jaime Garcia Hernandez, Venancio Perez Solis, Luis Saquipulla, and Derek Bracey, individually and on behalf of others similarly situated. Pursuant to Section I.C of Your Honor's Individual Practices, we respectfully request a thirty-day extension of time, until July 30, 2025, for Defendants to respond to the Amended Complaint.

The Parties are making efforts to resolve this case through Court-referred mediation, and their mediation session was just recently rescheduled to July 9, 2025. There were prior scheduling and rescheduling attempts made by the Parties and the Court-appointed mediator. This is the third request by our office for an extension of time for Defendants to respond to the Amended Complaint.

In addition, July 9, 2025, the date of the Parties' mediation session, is also presently scheduled as the Parties' deadline to file their Proposed Case Management Plan (see ECF No. 33). Thus, we also respectfully request that that deadline be extended to August 13, 2025, which is two weeks following the requested extended deadline for Defendants' response to the Amended Complaint. This is the second request for an extension of time for the Parties to file their Proposed Case Management Plan.

Defendants believe that it would be prudent, at this juncture, for the Parties to concentrate their time and resources upon negotiating a resolution rather than on pleadings or initial discovery. Moreover, should the Parties reach a resolution, such undertakings would become unnecessary. The prior requests for extensions of time were granted, and the requested extensions would not affect any other date or deadline in this case. We would have made these requests earlier but

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attempted to confer with Plaintiffs' counsel and ascertain their position on our intended requests. As of the time of this submission, we have not yet received a response from Plaintiffs' counsel.

We appreciate the Court's attention to these matters and consideration of these requests.

Respectfully submitted,

GORDON REES  
SCULLY MANSUKHANI, LLP

/s/ David J. Grech

David J. Grech  
Andrew J. Varvaro

*Attorneys for Defendants*

cc: All Counsel of Record (*via* ECF)